

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

Victor Ashe, Phil Lawson, and the League of)
Women Voters of Tennessee,)

Plaintiffs,)

v.)

Tre Hargett, in his official capacity as)
Tennessee Secretary of State; Mark Goins, in)
his official capacity as Tennessee)
Coordinator of Elections; and Jonathan)
Skrmetti, in his official capacity as)
Tennessee Attorney General,)

Defendants.)

Case No. 3:23-cv-01256
Judge Eli J. Richardson
Magistrate Judge Alistair Newbern

DECLARATION OF VICTOR ASHE

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am over the age of 18 years old, and I am otherwise competent to make this Declaration.

2. I am a columnist who writes a weekly local column, a former politician, and a politically active civic leader in East Tennessee.

3. As a Republican I was first elected to the Tennessee House in 1968 and then joined the Tennessee Senate in 1975 as the youngest-ever elected state senator in Tennessee history.

4. In 1984, I ran as the Republican nominee for United States Senate against Al Gore.

5. In 1987 I was elected Mayor of Knoxville, Tennessee—officially a non-partisan position—which I held until 2003.

6. Subsequently, I was appointed by President George W. Bush to be Ambassador to Poland.

7. I consider myself to be a member of the Republican Party and have regularly voted in federal, state, and local elections, including Republican primary elections, and intend to continue to do so in the future.

8. But I maintain a weekly column where I regularly criticize former President Trump and other Tennessee Republicans, such as Representative Tim Burchett, whom I publicly chastised recently for his vote to remove then-Speaker of the House Kevin McCarthy.

9. I also regularly and forcefully criticize Republicans who refused to certify the results of the 2020 election and who have not condemned the actions of January 6, 2021.

10. I am not certain, given the vague language of Tennessee Code Annotated Sections 2-7-115(b) and (c), the lack of definitions in the Tennessee Republican Party bylaws, and today's changing political climate, that I can vote in the Republican Primary without fear of prosecution for violating Section 2-7-115(b).

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of December 2023.



Victor Ashe